

Bronson Shoemaker

UNITED STATES DISTRICT COURT

for the
Southern District of OhioFILED
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CLERK OF COURT

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In the Matter of the Search of
UNITED STATES PRIORITY MAIL PARCEL 9505 5125 9706
1200 5535 07

Case No.

2:21-mj-00483
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
COLUMBUS

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

UNITED STATES PRIORITY MAIL PARCEL 9505 5125 9706 1200 5535 07

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. 841(a)(1)	Possession with intent to distribute a controlled substance
21 U.S.C. 843(b)	Prohibited use of a communication center (U.S. Mail)
21 U.S.C. 846	Conspiracy to possess with intent to distribute a controlled substance

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector Justin D. Koble, incorporated herein by reference

☒ Continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Justin D. Koble, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence. UNLAWFUL WITH F.R. Crim P 4.1(b)(2)(4).

Date: 7/22/2021

City and state: Columbus, Ohio



Judge's signature

Hon. Nora McCann King, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION
UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE**

I, Justin D. Koble, being duly sworn, do hereby state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS's Columbus, Ohio field office. In this capacity, I am responsible for investigating the use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violations of 18 U.S.C. §§ 1956 and 1957 (money laundering). Prior to my assignment as a Postal Inspector, from January 2007 through June 2014, I was employed as a state law enforcement officer in the State of Florida. As a state law enforcement officer for the State of Florida, I conducted numerous investigations involving the possession, sale, and manufacture of narcotics.

2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on multiple occasions. I have personally been the affiant for search warrants which have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center ("P&DC") involves

investigating the use of the U.S. Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.

3. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

4. This Affidavit is made in support of a search warrant for the following property, namely the **United States Postal Service (USPS) Priority Mail parcel bearing USPS Tracking Number 9505 5125 9706 1200 5535 07** (hereinafter, the “SUBJECT PARCEL”). This affidavit is made in support of a warrant to search the SUBJECT PARCEL for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offenses:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code § 841,
 - b. Use of a Communication Facility, in violation of Title 21, United States Code § 843(b), and
 - c. Conspiracy to Possess with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code § 846.
5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

6. On or about July 21, 2021, USPIS interdiction personnel in Columbus, Ohio interdicted the SUBJECT PARCEL at the USPS Columbus, Ohio Processing and Distribution Center. The SUBJECT PARCEL is addressed to “1041 Acorn Avenue, Columbus, OH 43207, Jessica M. Irrizary” with a return address of “7863 Lankershim Ave, Highland CA 92346, Jazmin Irrizary”. The parcel is a brown cardboard “ReadyPost” brand box measuring approximately 20” x 14” x 10” and weighing approximately 9 pounds 9 ounces. The SUBJECT PARCEL was mailed from San Bernardino, California 92404 on or about July 19, 2021. The \$71.65 in United States postage affixed to the parcel was paid for in cash.

PROBABLE CAUSE

7. Your Affiant has become aware through experience and training that drug traffickers frequently use Priority Mail Express and/or Priority Mail services offered by the USPS, to transport narcotics and other dangerous controlled substances as well as drug proceeds. Each of these mail services are favored for the transport of contraband, both controlled substances and drugs proceeds because they ensure quicker delivery than standard mail service. These priority services charge a higher fee but are particularly advantageous to drug traffickers because they are reliable and trackable. Notably, these services are not typically used for personal mailings but rather utilized by commercial businesses. Additionally, the higher fees charged by these mail services are usually paid by credit card or an established account and not in cash. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, your Affiant has learned of certain characteristics indicative of other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances as well as drug

proceeds. Some of these characteristics include, but are not necessarily limited to or used on every occasion - mail service fees paid in cash, parcel is dropped off at post office as compared to Click-N-Ship (USPS service which allows carrier pickup), handwritten label, false or non-existent return address, addressee is not known to receive mail at the listed delivery address, the package is heavily taped, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity. The advantage of dropping off the package at the post office as well as paying in cash allows the actual shipper to remain anonymous and not provide a paper trail. An additional characteristic possessed by the SUBJECT PARCEL is the "source state" origination of the parcel. U.S. Postal Inspectors, special agents of the Drug Enforcement Administration (DEA), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio.

8. On or about July 22, 2021, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, "7863 Lankershim Ave", was determined to be a valid address in the 92346 zip code. The name "Jazmin Irrizary" was not found to be associated with this address.

9. On or about July 22, 2021, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the destination information contained on the SUBJECT PARCEL. The address, "1041 Acorn Avenue", was found to be a valid address in the 43207 zip code; however, the name indicated on the parcel, "Jessica Irrizary", was not found to be associated with the address.

10. Based on my experience and training, I know that drug shippers will often list a

valid return address with a fictitious name. This is done in an attempt to legitimize the shipment and avoid detection by law enforcement. Although a valid recipient's address is necessary to permit the delivery of such packages, a false recipient's name is often used, for the same reasons.

11. Because the SUBJECT PARCEL was found to originate in a state known to be a source for controlled substance being mailed to Ohio, the return/destination information was handwritten, the postage for the SUBJECT PARCEL was paid in cash, the seams of the SUBJECT PARCEL are heavily taped and the return and destination names were not found to be associated with their respective addresses, the SUBJECT PARCEL was subjected by examination by a drug detecting canine.

EXAMINATION BY CERTIFIED DRUG CANINE

12. On or about July 21, 2021, your Affiant took custody of the SUBJECT PARCEL from the Columbus, Ohio Processing and Distribution Center. The SUBJECT PARCEL is currently located at a secure USPS facility located in Columbus, Ohio.

13. On or about July 22, 2021, 2021, U.S. Postal Inspectors contacted Trooper Lindsay Barrett, Ohio State Highway Patrol, who is the handler for "Gali," a drug detecting canine. "Gali" has been certified by the Ohio Peace Officers Training Association since May 2020 for tracking, article search, and the detection of Marijuana, Cocaine, Heroin, Methamphetamine, and their derivatives. Canine "Gali" has over 200 hours of training at the Ohio Highway Patrol K9 Training Facility. Both in training and actual deployments, canine "Gali" has successfully detected narcotics, demonstrating clear, passive alerts and establishing himself as a highly reliable police service dog.

14. The SUBJECT PARCEL was hidden among other parcels and mail processing equipment. Canine "Gali" was allowed to search the entire area. Trooper Barrett concluded that

"Gali" did alert positively and independently to the SUBJECT PARCEL. Based on that alert, Trooper Barrett concluded that the odor of one of the drugs "Gali" is trained and certified to detect was present.

CONCLUSION

15. I know based on training and experience that information listed herein identifies common characteristics of a U.S. Postal Service parcel which contains a controlled substance. Based upon my experience and training, this information, along with the parcel being mailed from a location of known drug activity and drug source location is indicative of the parcel containing narcotics.

16. Based upon the information contained in this affidavit, your Affiant believes that there is probable cause to believe that the parcel described below will contain evidence and/or contraband, fruits of crime, or other items illegally possessed:

a. **USPS Priority Mail parcel bearing USPS Tracking Number:
9505 5125 9706 1200 5535 07**

WHEREFORE, your Affiant respectfully requests that the Court issue a warrant, authorizing agents of the USPIS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, photograph, and seize if necessary, the SUBJECT PARCEL and its contents


Justin D. Koble
U.S. Postal Inspector

Sworn and subscribed to me this 22nd day of July, 2021 *CONSISTENT WITH F.R. Crim P. 4.1(b)(2)(A).*


HONORABLE ~~KIMBERLY A JOLSON~~ *N. M. IUNG*
UNITED STATES MAGISTRATE JUDGE